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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
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13 IN RE: JUUL LABS, INC., MARKETING,
14 SALES PRACTICES, AND PRODUCTS
15 LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**DEFENDANTS' UNOPPOSED
ADMINISTRATIVE MOTION FOR
EXTENSION OF DEADLINE**

16 This Document Relates to:

17 *San Francisco Unified School District v.*
18 *JUUL Labs, Inc., et al.*, Case No. 3:19-cv-
19 08177-WHO
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1 **TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that the Defendants will and hereby do move the Court for an
3 administrative order extending, by thirty (30) days, the deadline to file on the Docket the redacted
4 exhibits related to administrative motions filed in connection with the *San Francisco Unified*
5 *School District* (“SFUSD”) bellwether case and trial that no longer qualify for sealing in full.

6 Defendants file this motion and the attached Declaration of Michael J. Guzman pursuant to
7 Civil Local Rule 7-11. Plaintiffs do not oppose this motion. Pursuant to Civil Local Rule 7-11, no
8 hearing date has been set.

9 **BACKGROUND**

10 On September 13, 2024, the Court entered an order identifying 58 administrative motions
11 to seal filed in connection with the SFUSD bellwether case and trial and ordered the parties to
12 submit a joint chart identifying the documents—by docket number and exhibit—that contain
13 information not publicly disclosed during the SFUSD trial that continue to meet the compelling
14 justification standard for sealing and which documents may be unsealed (ECF No. 4299). The
15 parties submitted the Joint Notice of Filing of Response to Order Regarding Administrative
16 Motions to Seal on January 17, 2025 (ECF No. 4369) (the “Joint Chart”).

17 On January 28, 2025, after reviewing the parties’ Joint Chart, the Court issued a Final
18 Order Regarding Administrative Motions To Seal Filed in Connection with Motions for Summary
19 Judgment, Motions in Limine, & Motions re *SFUSD* Trial (ECF No. 4374). In the Order, the
20 Court granted the parties’ narrowed requests to file information under seal; unsealed the
21 documents and docket numbers that the parties agreed may be unsealed in whole; and—for docket
22 numbers that combined multiple exhibits, including exhibits that no party continues to seek to
23 seal—ordered the parties to, within twenty days of entry of the Order, file all exhibits that no
24 longer qualify for sealing in full. ECF No. 4374.

25 **REQUESTED RELIEF**

26 The Defendants respectfully move for an extension of the deadline for parties’ filing of
27 exhibits that no longer qualify for sealing from February 17, 2025, to March 19, 2025. Defendants
28 believe that additional time is required to ensure each document is properly reviewed and

1 redacted. Defendants continue to diligently work to review and identify each docket number and
 2 related exhibits that no longer qualify for sealing in full on the Docket but maintain that extending
 3 the deadline by thirty (30) days would provide time for meticulous completion of this process.
 4 Moreover, a thirty-day extension of the deadline to file the redacted exhibits would not otherwise
 5 impact this Court's administration of the Multidistrict Litigation, which remains active. Finally,
 6 the Plaintiffs, who have already filed their redacted exhibits on the Docket (ECF No. 4385) and
 7 who are no longer subject to the current deadline, do not oppose this request.

8 Accordingly, Defendants respectfully request that the Court grant the relief requested
 9 herein and enter the Proposed Order attached hereto.

11 DATED: February 13, 2025

Respectfully submitted,

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